

**REMARKS**

Claims 1-36 and 38-47 were pending in the Office Action. Upon entry of the present amendment, claims 31, 38 and 46 are canceled without prejudice or disclaimer in order to simplify the issues remaining on appeal, claims 32, 35 and 39 are amended, and new claims 48 and 49 are added. No new matter is added with these new claims, as support may be found, for example, at paragraphs [0043] and [0046-48]. The treatment of the pending claims in the Office Action is as follows:

- claims 40-44 stand rejected under 35 U.S.C. 112, first paragraph as failing to comply with the written description requirement.
- claims 1-10, 13-23, 27 and 31-38 stand rejected under 35 U.S.C. 103(a) as being unpatentable over an alleged three-way combination of Huttunen et al. (U.S. Patent No. 6,356,761), Strahm et al. (U.S. Patent Publication No. 2002/0133598) and Jackel et al. (U.S. Patent No. 6,725,268);
- claims 40-43 stand rejected under 35 U.S.C. 103(a) as being unpatentable over an alleged combination of Huttunen et al. and Jackel et al.;
- claim 47 stands rejected under 35 U.S.C. 103(a) as being unpatentable over an alleged combination of Huttunen et al. and Strahm et al.;
- claims 11-12, 24-26 and 39 stand rejected under 35 U.S.C. 103(a) as being unpatentable over an alleged four-way combination of Huttunen et al., Strahm, Jackel et al. and Chun et al. (U.S. Patent Application Publication No. 2002/0083029);
- claims 28-30 stand rejected under 35 U.S.C. 103(a) as being unpatentable over an alleged four-way combination of Huttunen et al., Strahm, Jackel and Szutu (U.S. Patent Application Publication No. 2001/0047395);

- claim 44 stands rejected under 35 U.S.C. 103(a) as being unpatentable over an alleged three-way combination of Huttunen, Jackel and Chun;
- claim 45 stands rejected under 35 U.S.C. 103(a) as being unpatentable over an alleged combination of Huttunen and Chun;

Applicants respectfully address these rejections below, in the hopes of narrowing and focusing the issues for appeal.

### **The Rejection Under 35 U.S.C. 112**

As an initial matter, the Office Action contends that the amendment to claim 40 (on June 20, 2006) introduced new matter. No new matter was added. The amendment added steps of “detecting a discovery request ...” and “in response to detecting said discovery request, providing a multi-level hierarchical directory of generic service names ....” Support for such steps can be found, for example, at paragraph [0046], which describe a “Discover” command to expand a category into a lower level of categories. As for the multi-level hierarchy, the preceding paragraph, paragraph [0045] describes an example hierarchical name structure where sub-levels and sub-sub-levels may be reached. For example, for one sub-level may be “Europe,” and additional sub-levels may be “Finland” and “Spain.” At paragraph [0050], the specification notes that “... a mobile terminal or other client can retrieve all sub-levels ....,” and that a “WAP or WEB directory” can be generated. Figures 6-7 also show an example in which the “news” category has a sub-level “sports,” and “sports” has a further sub-level of “baseball.” Applicants respectfully request that the rejection under 35 U.S.C. 112 be reconsidered and withdrawn.

**Independent Claim 15 and Dependent Claims 16-30**

Independent claim 15 recites a number of steps relating to generic service names and information categories. For example, after steps of “receiving a user selection of an information category corresponding to a first of the plurality of generic service names,” and “transmitting, to a first wireless network, a request for a sub-level of generic service names assigned to the information category,” claim 15 recites a step of “receiving, from the first wireless network in response to the request, a list of generic service names of the sub-level.” None of the applied references, alone or in combination, teaches or suggests these steps, and in particular receiving such a list of generic service names of a sub-level.

The Office Action concedes that the primary reference, Huttenen et al., does not teach or suggest such a step. Office Action, p. 13. Applicants agree, particularly since in the Huttenen et al. system, the mobile device supplies “regioninfo.com” to the browser, and receives a single IP address in response, and not “a list of generic service names of the sub-level.” See col. 9, line 66. To address this deficiency, the Office Action cites Strahm et al. and Jackel et al., but neither of those offers any teaching or suggestion that would modify Huttenen et al. in the manner alleged.

As for Strahm et al., the Office Action simply notes that that reference allows a mobile device to access the Internet using one of two different wireless networks (cellular and LAN). This offers no teaching or suggestion of receiving the list of generic service names of the sub-level, as recited, or of modifying Huttenen et al. to provide such a list.

As for Jackel et al., that reference describes a service in which a web server 30 executes a number of scripts 32, 34 and 36, where each script requests status information from an information source (42, 44, 45). See, e.g., col. 3, lines 10-30. That status information is

displayed for the user on a web page 22. Again, there is no teaching or suggestion of the recited list of generic service names of the sub-level, as recited in claim 15.

If the rejection of claim 15 is to be maintained on appeal, Applicants respectfully request clarification of where the claimed “list of generic service names of the sub-level,” and the step of receiving such a list, are allegedly found in these references.

In response to Applicants’ prior remarks, the Office Action notes that DNS servers maintain a tree structure. That tree structure does not, however, include the “regioninfo.com” text that is alleged to show a generic service name. The cited DNS server does not return a list of generic service names of a sub-level, as recited. To the contrary, the DNS server receives one URL from the AN, and provides a single corresponding IP address in response, which the AN then returns to the user. See, e.g., Huttenen et al. Fig. 5 (showing the correspondence). Indeed, the DNS server in Huttenen et al. (alleged to have a tree) does not even handle the “regioninfo.com” text (the alleged generic service name), and there is no logical basis for assuming that the DNS server tree will include the Huttenen et al. “regioninfo.com” text. There is no teaching or suggestion, anywhere in the applied references, of the Huttenen et al. AN sending, for receipt by the user, a list of generic service names of a sub-level, as recited.

For at least these reasons, Applicants submit that independent claim 15 distinguishes over the applied references, and is in condition for allowance. Claims 16-30 depend from claim 15, and are allowable for at least the same reasons as claim 15, and further in view of the various features recited therein. For example, Applicants continue to disagree with regard to claim 21. That claim recites a generic service name tree comprising multiple hierarchically arranged lower levels of generic service names. The Huttenen et al. DNS server (relied on in the Office Action to show a tree) has a table as shown in Fig. 5 of that patent. The listed entries are three URLs with their corresponding IP addresses – none of which are described in Huttenen et al. as being

generic service names. Indeed, the “regioninfo.com” text that is alleged to be a generic service name does not even appear in the Huttenen et al. DNS server tree. The applied references fail to teach or suggest the claimed tree with its hierarchically arranged lower levels of generic service names.

#### **Independent Claim 1 and Dependent Claims 2-14**

Independent claim 1 recites, among other features, “submitting, to a first wireless network, a user request to expand a selected generic service name to identify its sub-level generic service names.” None of the applied references teaches or suggest submitting such a request.

The Office Action (page 6) concedes that the primary reference applied to claim 1, Huttunen et al., fails to teach or suggest the claimed feature recited above. Applicants agree. The Huttunen et al. user enters “regioninfo.com” into the browser, and the user expects to receive an IP address in response – the user does not request any expansion of “regioninfo.com” to identify any sub-level generic service names, as recited.

None of the other applied references, Strahm et al. or Jackel et al. teaches or suggests such a request for expansion, either. As discussed above, the Office Action cites Strahm et al. for the mobile device accessing the Internet through two wireless networks (cellular and LAN), but that offers no teaching or suggestion of expanding a selected generic service name to identify sub-level generic service names. Similarly, the Office Action cites Jackel et al. for its status information from multiple servers, but there still is no user request to expand a selected generic service name to identify sub-level generic service names.

Additionally, claim 1 also recites “the mobile terminal receiving, in response to the request, a listing of additional sub-level generic service names categorized with the selected generic service name.” The Office Action makes the same citations to Strahm et al. and Jackel et al. as discussed above in claim 15, and as discussed above, none of the applied references teaches or suggests the terminal receiving a listing of additional sub-level generic service names.

For at least these reasons, Applicants submit that claim 1 distinguishes over the applied references, and is in condition for allowance. Claims 2-14 depend from claim 1, and are allowable for at least the same reasons as claim 1, and further in view of the various features recited therein. For example, claim 8 recites “the generic service name tree comprises multiple

hierarchically arranged lower levels of generic service names.” As discussed above with respect to claim 21, the applied references fail to teach or suggest such a tree.

**Independent Claim 48 and Dependent Claims 32-36, 39 and 49**

Applicants have canceled claim 31 without prejudice or disclaimer, and the dependent claims of claim 31 are now dependent on new independent claim 48. Independent claim 48 recites providing a user with an option of transmitting a discovery command requesting that a transmitted generic service name be resolved into a plurality of sub-level generic service names mapped to said transmitted generic service name by a wireless network receiving said discovery command, and providing a user with an option of transmitting a go command requesting that a transmitted generic service name be resolved into an Internet address by a wireless network receiving said go command. The claim goes on to recite features regarding the use of these commands. None of the applied references, alone or in combination, provides users with these two options and commands, and for at least these reasons, new independent claim 48 is believed to be in condition for allowance. Claims 32-36, 39 and 49 depend from claim 48, and are allowable for at least the same reasons as claim 48, and further in view of the various features recited therein.

**Independent Claim 40 and Dependent Claims 41-44**

Independent claim 40 recites, among other features, the following:

in response to detecting said discovery request, providing a multi-level hierarchical directory of generic service names to said requesting mobile terminal for display to a user

None of the applied references, alone or in combination, teaches or suggests the claim 40 server. As discussed above, the Huttenen et al. user enters “regioninfo.com” text into his/her browser, and in response, simply receives an IP address. There is no teaching or suggestion of

responding with the multi-level hierarchical directory of generic service names to said requesting mobile terminal for display to a user, as recited. The Jackel et al. web page 20 displays status information for a plurality of servers, but there is nothing to suggest that that status information is a multi-level hierarchical directory of generic service names.

The other applied references do not teach or suggest a modification to Huttunen et al. that would overcome these deficiencies. For at least these reasons, Applicants submit that independent claim 40 distinguishes over the applied references, and is in condition for allowance. Claims 41-44 depend from claim 40, and are allowable for at least the same reasons as claim 40, and further in view of the various features recited therein.

#### **Independent Claim 45**

Amended independent claim 45 recites, among other features, the following:

storing a plurality of generic service names in a database in the memory, each of the generic service names being mapped to a plurality of alternate information resources in a plurality of different languages, wherein said alternate information resources provide a common type of service

In rejecting claim 45, the Office Action concedes that the principal reference, Huttunen et al., fails to teach or suggest the recited use of language information. To address this deficiency, the Office Action combines Huttunen et al. with Chun et al. This is the same combination made in the prior Office Action, and the current Office Action does not respond to Applicants' arguments regarding this combination. As stated in the Office Action, Chun et al. relates generally to allowing users who speak different languages to access the same Internet site. Chun et al. does this by allowing users who speak different languages to enter a desired URL in their own native language, and then translating those native-language URLs (in the "Virtual" domain) into the Internet site's "Real" domain URL (e.g., English characters and numerals) by using a

phonetic dictionary. See, e.g., para. [0070] for an example table of Korean phonemes and corresponding Romanized phrases. Chun et al. involves different people accessing one site by entering different URLs. Chun et al. does not teach or suggest the Korean-language URL being “mapped to a plurality of alternate information resources in a plurality of different languages, wherein said alternate information resources provide a common type of service,” as recited in amended claim 45.

#### **Independent Claim 47**

Independent claim 47 recites, among other features, a mobile terminal “storing a language preference” and “appending data comprising stored values for language preference, Cell ID and Area ID to the first generic service name.” In rejecting this claim, the Office Action relies on the Huttenen et al. access node’s (AN’s) conversion of “regioninfo.com” to “tapiola.espooli.fi.” Office Action, p. 4. That operation is not performed by the Huttenen et al. mobile station, it is performed by the access node (AN). Accordingly, the AN has no idea what language settings (if any) the Huttenen et al. mobile device stores, and Huttenen et al. fails to teach or suggest the mobile device “storing” and “appending” steps recited above. Furthermore, the choice of “tapiola.espooli.fi” in Huttenen et al. was not based on a language setting stored by the mobile terminal, it was based on the mobile station’s location (or more precisely, the location of the base station). See, e.g., Huttenen et al. Fig. 6.

#### **Conclusion**

For at least the reasons set forth above, Applicants submit that pending claims 1-36 and 38-47 are distinguishable over the applied references, and are in condition for allowance. However, if the Examiner feels that additional discussion and/or amendment would be helpful,

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the Examiner is invited to telephone Applicants' undersigned representative at the number appearing below.

Respectfully submitted,

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